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Attorneys for Defendants
RIMINI STREET, INC. and SETH RAVIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;)
ORACLE AMERICA, INC., a Delaware)
corporation; and ORACLE INTERNATIONAL)
CORPORATION, a California corporation,)

Plaintiffs,)

vs.)

RIMINI STREET, INC., a Nevada corporation;)
SETH RAVIN, an individual,)

Defendants.)

Case No. 2:10-cv-0106-LRH-PAL

**RIMINI STREET'S MOTION TO SEAL ITS
RESPONSE TO ORACLE'S OBJECTIONS
PURSUANT TO FED. R. CIV. P. 56(C)(2)**

1 Pursuant to the Stipulated Protective Order entered by the Court on May 21, 2010, Dkt. 55
2 (“Protective Order”), and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Defendant
3 Rimini Street, Inc. (“Rimini”) respectfully requests that the Court order the Clerk to file under seal
4 Rimini’s Response to Oracle’s Objections Pursuant to Fed. R. Civ. P. 56(c)(2), Dkt. 318 (“Rimini’s
5 Response”).

6 Rimini’s Response contains information that Plaintiffs and certain third parties have
7 designated as Confidential or Highly Confidential—Attorneys’ Eyes Only under the protective
8 order. The Protective Order states, “Counsel for any Designating Party may designate any
9 Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information—Attorneys’
10 Eyes Only’ under the terms of this Protective Order only if such counsel in good faith believes that
11 such Discovery Material contains such information and is subject to protection under Federal Rule of
12 Civil Procedure 26(c). The designation by any Designating Party of any Discovery Material as
13 ‘Confidential Information’ or ‘Highly Confidential Information—Attorneys’ Eyes Only’ shall
14 constitute a representation that an attorney for the Designating Party reasonably believes there is a
15 valid basis for such designation.” Protective Order ¶ 2. Rimini submits its Response under seal
16 pursuant to the Protective Order based on Oracle and third party representations that there is a valid
17 basis under the Protective Order for the confidentiality designations.

18 Rimini has submitted redacted versions of its Response to the Court’s public files, which
19 would allow public access to Rimini’s Response except for those portions comprising the designated
20 confidential information. Accordingly, Rimini’s request to seal is narrowly tailored. For the
21 foregoing reasons, Rimini respectfully requests that the Court find there is a compelling interest in
22 filing Rimini’s Response, Dkt. 318, under seal.

1 DATED: June 5, 2012

SHOOK, HARDY & BACON LLP

3 By: /s/Robert H. Reckers
Robert H. Reckers, Esq

5 *Attorneys for Defendants*
Rimini Street, Inc. and Seth Ravin

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of June, 2012, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, District of Nevada, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ Robert H. Reckers